

Hearing Date: Oct. 16, 2012

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PINNACLE AIRLINES CORP., et al.,

Debtors.

Chapter 11

Case No. 12-11343 (REG)

(Jointly Administered)

**CORRECTIONS TO BRIEF AND DECLARATIONS OF VIRGINIA L. HUGHES AND
MARK SHAPIRO IN SUPPORT OF DEBTORS' MOTION TO REJECT
COLLECTIVE BARGAINING AGREEMENTS WITH THE AIR LINE PILOTS
ASSOCIATION, INTERNATIONAL AND THE ASSOCIATION OF
FLIGHT ATTENDANTS-CWA PURSUANT TO 11 U.S.C. § 1113**

Brief or Declarant	Page/¶	Text	Correction
Brief	6/A (third para.)	Declaration of Daniel M. Kasper, dated September 13, 2012 ("Kasper Decl.") ¶ 32	<i>See generally</i> Declaration of Daniel M. Kasper, dated September 13, 2012 ("Kasper Decl.") ¶¶ 29-36
	7/A (first para.)	Kasper Decl. ¶ 15	<i>See generally</i> Kasper Decl. ¶¶ 7-19
	7/A (second para.)	<i>Id.</i> ¶ 16	<i>See generally Id.</i> ¶¶ 16, 29-56
	7/n.2	"... compensation varies depending on ticket sales."	"... compensation varies depending on ticket sales. (Kasper Decl. ¶ 40.)"
	8/A (first para.)	<i>Id.</i> ¶¶ 17-18, 50	<i>See generally Id.</i> ¶¶ 16-18, 27, 29-56
	9/A (first para.)	("Hughes Decl.") ¶¶ 33-38, & Ex. 11	("Hughes Decl.") ¶¶ 34-39
	9/B (second para.)	Hughes Decl. ¶¶ 33-34; Kasper Decl. ¶¶ 19-20, 49-51	Hughes Decl. ¶¶ 34-35; Kasper Decl. ¶¶ 19-20, 49-51, 80
	10/B (last para.)	Hughes Decl. ¶ 11	Hughes Decl. ¶ 36
	10/n.7	Hughes Decl. Ex. 2	Hughes Decl. Ex. 8
	11/B (first para.)	Hughes Decl. ¶¶ 35-36, Ex. 11	Hughes Decl. ¶¶ 36-37 & Ex. 12
	12/C (first para.)	Dkt. Nos. 23, Ex. D; 289	Dkt. No. 23, Ex. D

	15/E (last para.)	Hughes Decl. ¶¶ 14-21	Hughes Decl. ¶¶ 14-20
	16/E (first para.)	Glass Decl. ¶ 14	Glass Decl. ¶¶ 1-4, 14
	18/E.1 (first para.)	Hughes Decl. ¶ 17	Hughes Decl. ¶¶ 17-18
	19/E.2 (first para.)	Glass Decl. § VII.B	Glass Decl. §§ VII, VIII
	24/F.2.(a) (third para., last line)	<i>Id.</i> ¶ 27 & Ex. 4	<i>Id.</i> ¶¶ 27-29 & Ex. 4
	25/F.2.(b) (last para.)	Kasper Decl. ¶ 71; Ex. 23, Pilot Costs per Pilot Block Hour for RJs with More than 50 Seats, 2011; ¶¶ 81-82	Kasper Decl. ¶¶ 71-79; Ex. 23, Pilot Costs per Pilot Block Hour for RJs with More than 50 Seats, 2011; ¶¶ 80-83
	25/F.2.(b) (last para.)	“... flying 76-seat aircraft. (<i>Id.</i>)”	“... flying 76-seat aircraft. (<i>Id.</i> ¶¶ 71-83.)”
	27/F.3 (first para.)	<i>Id.</i> ¶¶ 9-15	<i>Id.</i> ¶¶ 9-15 & Ex. 1
	27/F.3 (first para.)	<i>Id.</i> ¶¶ 16-18	<i>Id.</i> ¶¶ 16-18 & Ex. 1
	27/F.3 (second para.)	Hughes Decl. ¶¶ 36-37 & Ex. 11	Hughes Decl. ¶¶ 36-38 & Ex. 12; Shapiro Decl. ¶ 27
	27/F.3 (second para.)	Dkt. Nos. 23, Ex. D; 289	Dkt. No. 23, Ex. D
	27/F.3 (last para.)	Hughes Decl. Ex. 2, DIP Hearing Tr., at 176	Hughes Decl. Ex. 2, DIP Hearing Tr., at 176; Shapiro Decl. ¶¶ 22, 29
	28/F.3 (first para.)	Shapiro Decl. ¶ 29	Shapiro Decl. ¶¶ 28-29 & Ex. 1
	30/F.5.(a) (second para.)	“... produce approximately \$31.5 million in annual savings.”	“... produce approximately \$31.5 million in annual savings. (Hunyor Decl. Ex. 1.)”
	31/F.5.(a) (fourth bullet point)	e.g., <i>id.</i> ¶ 24	e.g., <i>id.</i> ¶ 124
	32/G (last para.)	Ryan Decl. ¶ 4; Harrison Decl. ¶ 4	Declaration of Patrick Ryan, dated September 13, 2012 (“Ryan Decl.”) ¶¶ 4-5; Harrison Decl. ¶¶ 4-5
	33/G (second para., last line)	Ryan Decl. ¶ 9; Harrison Decl. ¶ 8	Ryan Decl. ¶¶ 9-10; Harrison Decl. ¶¶ 8-9
	34/G (first para.)	Ryan Decl. ¶¶ 7, 9-11	Ryan Decl. ¶¶ 7-11
	34/G (last para.)	Harrison Decl. ¶¶ 14-17	Harrison Decl. ¶¶ 14-18
	35/G (second para.)	<i>Id.</i> ¶¶ 19-23	<i>Id.</i> ¶¶ 19-22
	35/G (fourth para.)	Ryan Decl. ¶ 31	Spanjers Decl. ¶ 34
	39/I.B (first para.)	Hughes Decl. ¶ 7	Hughes Decl. ¶¶ 7, 9-13
	42/I.B (first para.)	Kasper Decl. ¶¶ 65, 88	Kasper Decl. ¶¶ 45-56, 65, 88
	42/I.B (first para.)	Kasper Decl. ¶ 27	Kasper Decl. ¶¶ 20, 27, 88
	44/I.C (last para.)	<i>Id.</i> ¶¶ 13-15	<i>Id.</i> ¶¶ 10-15
	45/I.C (second para.)	Dkt. Nos. 23, Ex. D; 289	Dkt. No. 23, Ex. D

	46/II.B (last para.)	Ryan Decl. ¶ 6; Harrison Decl. ¶ 6	Ryan Decl. ¶¶ 10, 17; Harrison Decl. ¶¶ 9, 18
	47/II.B (first para., last line)	Ryan Decl. ¶¶ 7-8, 15; Harrison Decl. ¶¶ 7, 15, 17	Ryan Decl. ¶¶ 5, 7-8, 15; Harrison Decl. ¶¶ 4, 7, 15, 17
	47/II.B (second para.)	“ . . . any way they liked. (Ryan Decl. ¶ 11; Harrison Decl. ¶ 10.)”	“ . . . any way they liked. (Ryan Decl. ¶ 11; Harrison Decl. ¶¶ 10-11.)”
	49/II.C (first para.)	Harrison Decl. ¶¶ 7, 15	Harrison Decl. ¶¶ 6-7, 15
	50/III.A (last line)	Glass Ex. 17	Glass Decl. Ex. 17
	52/III.A (first para.)	Glass Decl. ¶ 27 & Ex. 53	Glass Decl. ¶ 27 & Ex. 17
	54/Conclusion	“ . . . authorizing it to reject its CBAs with ALPA, AFA, and TWU pursuant to Section 1113 . . . ”	“ . . . authorizing it to reject its CBAs with ALPA and AFA pursuant to Section 1113 . . . ”
Virginia L. Hughes	15/37	Exhibit 11	Exhibit 12
Mark Shapiro	1/caption	AIRLINE PILOTS’	AIR LINE PILOTS